

January 26, 2020

Postal Regulatory Commission
901 New York Avenue NW, Suite 200
Washington, DC 20268-0001

RE: Docket No. RM2017-3; Reintroduction of Rate Increase Proposals through 2025

Dear Commissioners:

Ohio's Electric Cooperatives is a statewide service organization owned by 25 member cooperatives across Ohio and West Virginia. Among the many services provided to members is the publication of a membership magazine sent by mail to 300,000 consumer-members across rural Ohio — an area that includes a disproportionate percentage of population that would be considered economically disadvantaged compared to the general population.

Electric cooperatives were created not only to bring electricity to areas where no one else would do that job, but much more broadly to improve the lives of those they serve. As not-for-profit, consumer-owned and consumer-governed organizations, electric cooperatives utilize mail for many reasons, including — but going well beyond — the distribution of those membership magazines. Our mailings provide members with critical information about their cooperatives, including their cooperatives' financial condition, how they can participate in electing cooperative directors to represent them on the cooperatives' boards of directors, and how they can participate in cooperative meetings. What's more, those mailings also include information that can help consumers use energy more wisely, participate in cooperative energy management programs, and otherwise save money on their electric service.

It has been suggested in other comments on this matter before the PRC that the drastic postage rate increase that will arise from this proposal will only serve to drive postal customers completely away from the USPS and to emerging means of disseminating information, such as internet-based communications, thereby threatening the very existence of the USPS. While this strikes us as a persuasive and realistic argument, the unique position of electric cooperatives, both in Ohio and nationwide, renders the situation even more dire for us.

Electric cooperatives and their members would be particularly affected by such a sharp increase in rates because, as has been widely documented, rural America in general is egregiously under-covered by broadband service; wide swaths of real estate in rural Ohio — and rural areas across the country, for that matter — have no access to internet service. Even if the internet

provided a reliable and accepted option for electric cooperatives to get those vital communications to their members — which it certainly does not — the lack of broadband service in rural areas makes the matter moot. Electric cooperatives, because of who they serve, would literally be unable to communicate with their members if they were not able to utilize the service provided by the USPS.

So, as it stands, because cooperatives are not-for-profit and consumer-owned, they will be forced to pass on to their consumer-members the full cost of any postage rate increases. A 40% increase that would be foisted upon periodicals such as ours, as well as the increases in rates for other mailings, would have a drastic negative impact on those members, who, as previously stated, already are generally disadvantaged economically.

Please do the right thing and reconsider your proposal.

Thank you for your consideration.



Jeff McCallister
Managing Editor
Ohio Cooperative Living magazine